



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK
F. #2016R01805

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 10, 2019

By Email and ECF

All Counsel on Attached Appendix A

Re: United States v. Jeffrey Chartier, et al.
Criminal Docket No. 17-372 (JS)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

The government has made the following materials available at First Choice Copy ("First Choice") for reproduction to the defendants:

- Subscriber information, IP address logs and billing payment information from Endurance International Group, Inc., for Sa*****@aolcom (EDNY-PTP_000517361 – EDNY-PTP_000517649).
- Electronic communications involving a victim and electronic communications involving Erik Matz (EDNY-PTP_000517650 – EDNY-PTP_000518749).
- Trading statements and trading information relating to certain victims (EDNY-PTP_000634853 – EDNY-PTP_000634930).

Where affidavits concerning the authenticity of business records are included herein or in previous discovery productions, per Federal Rules of Evidence 803(6) and 902(11) the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

Defense Counsel

May 10, 2019

Page 2

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: /s/
Whitman G.S. Knapp
Assistant U.S. Attorney
(718) 254-6107

cc: Clerk of the Court (JS) (by ECF)

APPENDIX A: DEFENSE COUNSEL

Robert P. LaRusso, Esq.
LaRusso Conway & Bartling LLP
300 Old Country Road, Ste. 341
Mineola, New York 11501

David S. Smith, Esq.
Smith & King, LLC
666 Old Country Road, Ste. 305
Garden City, New York 11530

Stephen Lloyd Brounstein, Esq.
Steve L. Brounstein, PLLC
32 Court Street, Ste. 408
Brooklyn, NY 11201

Kevin J. Keating, Esq.
Law Office of Kevin J. Keating
666 Old Country Road, #501
Garden City, New York 11530

Michael H. Gold, Esq.
350 Fifth Avenue Ste. 6800
New York, NY 10118

Steve Zissou, Esq.
Steve Zissou & Associates
42-40 Bell Blvd., Ste. 302
Bayside, NY 11361

John F. Kaley, Esq.
Doar Rieck Kaley & Mack
217 Broadway, Ste. 707
New York, New York 10007

Randy Scott Zelin, Esq.
Randy Scott Zelin PC
110 East 59th Street
New York, NY 10022

Ira Lee Sorkin, Esq.
Mintz & Gold LP
600 Third Avenue, 25th Floor
New York, NY 10016

Joseph W. Ryan, Jr., Esq.
Melville Law Center
225 Old Country Road
Melville, New York 11747-3111

Avraham C. Moskowitz, Esq.
Moskowitz & Book, LLP
345 Seventh Avenue, 21st Floor
New York, New York 10001

Lloyd J. Nadel, Esq.
Lloyd J. Nadel PLLC
170 Old Country Road, Ste. 600
Mineola, NY 11501

Steven Goldsobel, Esq.
Law Offices of Steven Goldsobel
1901 Avenue of the Stars
Los Angeles, California 90067

James Darrow, Esq.
Federal Public Defenders
770 Federal Plaza
Central Islip, NY 11722

Christopher Bruno, Esq.
Bruno & Degenhardt, P.C.
10615 Judicial Drive, Ste. 703
Fairfax, VA 22030

John S. Wallenstein, Esq.
Law Office of John S. Wallenstein
1100 Franklin Avenue, Ste. 100
Garden City, New York 11530